

**UNITED STATES DISTRICT COURT FEB 01 2024**

 for the  
 District of New Mexico

**MITCHELL R. ELFERS**  
**CLERK OF COURT**

United States of America )

v. )

Krystle Ornelas ) Case No. 24-MJ-142

*Defendant(s)*
**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 30, 2024 in the county of Curry County in the  
 District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1) and (b)(1) (C)	Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Methamphetamine.

This criminal complaint is based on these facts:

See attached affidavit, incorporated by reference herein.

Continued on the attached sheet.


*Complainant's signature*


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*Chandler Rule*
*Printed name and title*


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*Chandler Rule, DEA Special Agent*
*Printed name and title*

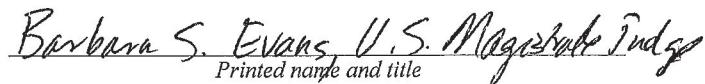
Telephonically sworn and electronically signed.

Sworn to before me and signed in my presence:

Date: 1/31/24


*Judge's signature*

City and state: Roswell, NM


*Printed name and title*

**AFFIDAVIT**

I, Chandler Rule, Special Agent with the Drug Enforcement Administration (“DEA”), being duly sworn, depose and state as follows:

1. I have been a Special Agent with the DEA since 2021. As such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct investigations and to make arrests for criminal offenses, to include those enumerated in 18 U.S.C. § 2516.

2. To become a Special Agent, I received advanced training in controlled substance identification, narcotics related investigation techniques, interview and interrogation training, preparation of search warrants, tactical applications of narcotics enforcement, surveillance and electronic monitoring techniques. I also received training in the methods of operation of Drug Trafficking Organizations, and in the investigation of Title 21 violations. As a result, I am familiar with matters including, but not limited to, the means and methods used by individuals to purchase, transport, store, and distribute drugs and to hide profits generated from those transactions.

3. This affidavit is based on my observations and information obtained from other law enforcement sources. It does not set forth all of my knowledge related to this investigation. This affidavit is submitted in support of a criminal complaint charging Krystle Ornelas (“Ornelas”) with the following violations:

- a. 21 U.S.C. §§ 841(a)(1) and (b)(1)(C): Possession with Intent to Distribute a Mixture and Substance Containing a Detectable Amount of Methamphetamine.

**PROBABLE CAUSE****A. Stop and Search**

4. On January 30, 2024, officers with the Clovis Police Department observed a blue Mitsubishi traveling northbound on Prince Street, in Clovis, New Mexico, within Curry County. The Mitsubishi was registered to Krystle Ornelas.

5. Officers stopped the Mitsubishi in the 2100 block of South Prince Street in Clovis. Agents identified the driver, and lone occupant, as Krystle Ornelas.

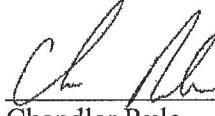
6. Agents conducted a probable cause search of the Mitsubishi and located five plastic-wrapped bundles containing a clear substance consistent with methamphetamine in the back seat on the driver’s side. Agents field tested and weighed the suspected methamphetamine. The substance tested presumptive positive for methamphetamine and weighed approximately 21 gross pounds.

7. Agents provided Ornelas her written and verbal Miranda rights. Ornelas agreed to answer questions without her lawyer present. Ornelas told agents that she knew she was

transporting crystal methamphetamine. Ornelas also told agents that she was delivering the methamphetamine to a person she had not met yet, and in return was going to receive an unknown amount of money.

**B. Conclusion**

8. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.



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Chandler Rule  
Special Agent  
Drug Enforcement Administration

Telephonically sworn and electronically signed on January 31, 2024.



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HONORABLE BARBARA EVANS  
UNITED STATES MAGISTRATE JUDGE  
District of New Mexico